



July 2, 1990

Verne Rosse, P.E.
Waste Management Section
Nevada Division of Environmental Protection
123 West Nye Lane
Capitol Complex
Carson City, NV 89710

Re: EPA RCRA Compliance Evaluation Inspection Report
March 13, 1990 Inspection

Dear Mr. Rosse;

The above referenced inspection report indicates that the container storage pad is not included in the RCRA Part A application or in the facility's Hazardous Waste Permit.

It is our understanding that this area is authorized under interim status under the provisions of section 270.10(g), based on the following:

1. On September 9, 1987 it was determined that the salt from the effluent evaporation "would not be classified as a listed hazardous waste". Letter from NDEP dated September 9, 1987.

2. On January 31, 1989, the salt was reclassified as a potentially listed hazardous waste by a site inspector; see letter dated January 24, 1989.

3. On March 7, 1989, NDEP officials and ETICAM met to discuss the regulatory classification of the salt. As was agreed with NDEP, a revised Part A application was submitted on March 30, 1989 to include the effluent tanks, evaporator-crystallizer and ancillary equipment, and a storage pad for containers of salt.

Based on this information, the use of this pad to store hazardous waste, (F006, F007) is authorized under interim status procedures.

Rhode Island
Corporate/Sales:
410 South Main Street
Providence, RI 02903
Telephone: (401) 831-7242
1-800-541-8673
FAX: (401) 831-7383

Rhode Island
Plant:
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Telephone: (401) 738-3261
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Nevada
2095 Newlands Dr. E.
Fernley, NV 89408
Telephone: (702) 575-2760
1-800-648-9931
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Texas
3201 Lucius McCelvey Drive
Temple, TX 76500
EPA# TXD 981903768

Illinois
3001 Highway #3
Granite City, IL 62040
EPA# ILD 981531643

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Additionally, the salt delisting program is still in progress; The EPA will be approving the waste analysis plan shortly, and we are shipping about 40 tons a week to a permitted landfill for final disposal.

Please contact me if there are further questions regarding this issue.

Sincerely,

A handwritten signature in cursive script, appearing to read "Byron B. Bradd".

Byron B. Bradd, P.E.
General Manager

cc:/ with attachments

Dan Gross, NDEP
Doug Martin, NDEP
Karin Schwinn, EPA Region 9